



**RE: South Dayton Dump - revision to the VI WP for the July 2012 sampling event**

Marshall, Laura to: Leslie Patterson

Cc: "Jennifer.Simms@CH2M.com", "Brett.Fishwild@CH2M.com", Steven Renninger, "Mellon, Chuck", "Watterworth, Randy"

US EPA RECORDS CENTER REGION 5



505719

07/12/2012 10:43 AM

From: "Marshall, Laura" <Laura.Marshall@epa.state.oh.us>

To: Leslie Patterson/R5/USEPA/US@EPA,

Cc: "Jennifer.Simms@CH2M.com" <Jennifer.Simms@CH2M.com>, "Brett.Fishwild@CH2M.com" <Brett.Fishwild@CH2M.com>, Steven Renninger/CI/USEPA/US@EPA, "Mellon, Chuck" <Chuck.Mellon@epa.state.oh.us>, "Watterworth, Randy" <Randy.Watterworth@epa.state.oh.us>

Leslie,

Here is some additional information and background on some of the issues CH2MHill listed in their email and Addendum:

Item 1. I have attached the email where CRA says that they will sample the residence on Parcel 3251 (2232 East River Road). Also, CH2MHill notes that there are buildings in the area that are not being sampled. I don't presume to speak for Steve, but keep in mind that these buildings were selected by Steve and the START contractor to provide data for the removal assessment, so while we don't disagree that these other building may need to be sampled, it may be beyond the scope of this sampling event.

Item 3. Sampling density It is Ohio EPA's position that additional buildings should be sampled with at least two sub-slab points. (See page 19 of our vapor intrusion guidance document <http://www.epa.ohio.gov/portals/30/rules/Vapor%20Intrusion%20to%20Indoor%20Air.pdf> ) This is supported by the growing evidence of variability in sub-slab conditions, and was supported when we consulted with Dominic DiGiulio, USEPA Office of Research and Development, National Risk Management Research Laboratory, Ground-Water and Ecosystem Restoration Division, Ada OK, during the development of the work plan. So we concur with continuing with the rationale of two sub-slab points for the residential structures.

Technical Memo, Modification 5, Radon sampling

We caution support of the calculated attenuation factors from the radon sampling. Studies have shown that attenuation factors calculated from radon sampling may not be representative of the attenuation of the chemicals of concern. Some studies have also shown that attenuation factors calculated for one chemical of concern may not be applicable to other chemicals. So the radon AFs are a piece of information to consider, we would not want to rely on them. (Let me know if you would the references for those studies.)

Let me know if you would like to discuss any of this.

Thanks,

Laura

Laura Marshall

Site Coordinator

Division of Environmental Response and Revitalization

yes if over  
600 sq ft

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From: Brett.Fishwild@CH2M.com [mailto:Brett.Fishwild@CH2M.com]  
Sent: Wednesday, July 11, 2012 3:27 PM  
To: Patterson.Leslie@epamail.epa.gov; Renninger.Steven@epamail.epa.gov; Marshall, Laura  
Cc: Jennifer.Simms@CH2M.com  
Subject: South Dayton Dump - revision to the VI WP for the July 2012 sampling event  
Importance: High

Hello Leslie –

CH2M HILL has completed their review of the revisions that CRA made to the USEPA-approved VI Investigation Work Plan (2011). As we discussed with you last week, the CRA revisions to the work plan were difficult to review and did not appear to capture all of the issues discussed in the multiple teleconferences. So at your direction, CH2M HILL has prepared the attached Addendum which can be attached to the approved Work Plan. This Addendum captures in a concise fashion the changes discussed during the teleconferences.

Additionally, CH2M HILL has several comments for review/consideration by EPA. Please see those issues below:

1. We did our best to determine exactly what the additional buildings are from all of the e-mails and CRA's revised WP – which didn't always match up. They have agreed to do 8 additional buildings so far, and we expect they will also agree to do the 9th (residence south of Vinny's on Parcel 3251) but we have not seen a response to Karen's original e-mail on that. Figure 1 shows these nine buildings. There are several buildings in the area that are not being included:
  - a. Two buildings on Parcel 4464, and one on Parcel 5224 (between Vinny's and Parcel 3251). Neither of these were colored blue on Steve Renniger's figure, and neither were included in CRA's revised WP.
  - b. The trailer park office building on Parcel 2943 - we think Steve Renniger is planning on sampling here but not CRA (is this correct?).
  - c. There are no DP&L buildings indicated at this time.
2. The additional analytical work discussed in Modification 1-4b of the Addendum regarding what to do if combustible gases are detected (e.g., C1 – C12 analysis), is likely not a major issue. There were only two buildings in Round 1 with subslab LEL greater than 10% (the mitigation SVSL), and those two are being mitigated so they won't be sampled Round 2. We think it unlikely that CRA will encounter other buildings with subslab LEL concentrations above 10% at this point. However if they do, the extended TO-15 TIC list with the chromatogram was sufficient for us to determine it was gasoline related with the Round 1 samples. Therefore, we could simply request that they provide the TIC list with chromatograms again.
3. For the new parcels recently added to the VI work: USEPA needs to provide direction on how many subslab probes CRA should install at each of the additional residential buildings. CRA didn't specify a number in their revised WP. For the original VI Study, there was only one residence and the work plan called for 2 probes even though the bldg is less than 1,500 sq ft. We don't really feel it is

necessary to do more than one on a technical basis because the buildings are not close to the potentially impacted area, but to be consistent we prepared the Addendum (Table 1) assuming that 2 probes would be required.

4. We left Table 1 in tracked changes so CRA could easily see all the revisions (both from CRA and CH2M HILL).

5. We did not review the red-lined field data sheet that CRA provided. It is their responsibility to collect the necessary field data and it doesn't how they do that.

Please let us know if you have any questions.

Thank you.

Brett A. Fishwild  
Associate Project Manager  
Geologist

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